

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) INDICTMENT
Plaintiff,)
v.)
GEORGE BAYNES,)
aka ISSA YUSEF,)
AARON BETTS,)
aka HARUN,)
Defendants.)
CASE NO. 1:24 CR 00176
Title 18, United States Code,
Sections 554(a), 922(a)(6),
922(d)(1), 922(g)(1),
922(q)(2)(A), 924(a)(4),
924(a)(8), 932(b), 933(a)(1),
933(a)(3), 1958(a), and 2

COUNT 1

(Trafficking in Firearms, 18 U.S.C. § 933(a)(1))

JUDGE BARKER

The Grand Jury charges:

From on or about December 6, 2023 to on or about December 13, 2023, in the Northern District of Ohio, Eastern Division, Defendant GEORGE BAYNES, aka ISSA YUSEF, did ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit:

DATE	FIREARMS
12/6/2023	(1) Taurus, .357 caliber revolver, serial number 9772; (2) Masterpiece Arms, MPA30, 9 mm pistol, serial number F8969; (3) Para-Ordnance Manufacturing, 1911 SSP, .45 caliber pistol, serial number P168922; and (4) FMJ, PM11, 9 mm pistol, serial number 94-0005376
12/13/2023	(1) Ruger, AR-556, 5.56 mm rifle, serial number 857-53554; (2) Leinad, PM-11, 9 mm pistol, serial number 94-0027837; and (3) Glock, Model 45, 9 mm pistol, serial number BPUK003

to a recipient in or otherwise affecting commerce, knowing, or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1).

COUNT 2

(Felon in Possession of a Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, Defendant GEORGE BAYNES, aka ISSA YUSEF, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Carrying Concealed Weapon and Possession of Dangerous Ordnance, on or about December 2, 1981, in Case Number CR-81-166166-D, in Cuyahoga County Court of Common Pleas; Carrying Concealed Weapon, on or about November 15, 1990, in Case Number CR-90-252533-ZA, in Cuyahoga County Court of Common Pleas; and Grand Theft and Gross Sexual Imposition, on or about January 23, 1995, in Case Number CR-94-313845-ZA, in Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce firearms, to wit: a Taurus, .357 caliber revolver, serial number 9772; a Masterpiece Arms, MPA30, 9 mm pistol, serial number F8969; a Para-Ordnance Manufacturing, 1911 SSP, .45 caliber pistol, serial number P168922; and a FMJ, PM11, 9 mm pistol, serial number 94-0005376, said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 3

(Providing Firearms to a Convicted Felon, 18 U.S.C. §§ 922(d)(1) and 924(a)(8))

The Grand Jury further charges:

On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, Defendant GEORGE BAYNES, aka ISSA YUSEF, did sell or otherwise dispose of firearms, to wit: a Taurus, .357 caliber revolver, serial number 9772; a Masterpiece Arms, MPA30, 9 mm pistol, serial number F8969; a Para-Ordnance Manufacturing, 1911 SSP, .45 caliber pistol, serial number P168922; and a FMJ, PM11, 9 mm pistol, serial number 94-0005376, to a person

knowing or having reasonable cause to believe that such person has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(8).

COUNT 4

(Felon in Possession of a Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

On or about December 13, 2023, in the Northern District of Ohio, Eastern Division, Defendant GEORGE BAYNES, aka ISSA YUSEF, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Carrying Concealed Weapon and Possession of Dangerous Ordnance, on or about December 2, 1981, in Case Number CR-81-166166-D, in Cuyahoga County Court of Common Pleas; Carrying Concealed Weapon, on or about November 15, 1990, in Case Number CR-90-252533-ZA, in Cuyahoga County Court of Common Pleas; and Grand Theft and Gross Sexual Imposition, on or about January 23, 1995, in Case Number CR-94-313845-ZA, in Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce firearms, to wit: a Ruger, AR-556, 5.56 mm rifle, serial number 857-53554; a Leinad, PM-11, 9 mm pistol, serial number 94-0027837; and a Glock, Model 45, 9 mm pistol, serial number BPUK003, said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 5

(Providing Firearms to a Convicted Felon, 18 U.S.C. §§ 922(d)(1) and 924(a)(8))

The Grand Jury further charges:

On or about December 13, 2023, in the Northern District of Ohio, Eastern Division, Defendant GEORGE BAYNES, aka ISSA YUSEF, did sell or otherwise dispose of firearms, to wit: a Ruger, AR-556, 5.56 mm rifle, serial number 857-53554; a Leinad, PM-11, 9 mm pistol,

serial number 94-0027837; and a Glock, Model 45, 9 mm pistol, serial number BPUK003, to a person knowing or having reasonable cause to believe that such person has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(8).

COUNT 6

(Attempted Smuggling of Goods from the United States, 18 U.S.C. §§ 554(a) and 2)

The Grand Jury further charges:

From on or about January 5, 2024 to on or about May 3, 2024, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants GEORGE BAYNES, aka ISSA YUSEF, and AARON BETTS, aka, HARUN, did willfully and knowingly attempt to export and send firearms, magazines, a gas mask, and pipe bomb components from the United States, contrary to the Foreign Trade Regulations (15 C.F.R. Part 30 et seq.), regulations of the United States, in violation of Title 18, United States Code, Sections 554(a) and 2.

COUNT 7

(Conspiracy to Straw Purchase Firearms, 18 U.S.C. § 932(b)(1))

The Grand Jury further charges:

From on or about April 4, 2024 to on or about April 20, 2024, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants GEORGE BAYNES, aka ISSA YUSEF, AARON BETTS, aka HARUN, and others known and unknown to the Grand Jury did knowingly and intentionally combine, conspire, confederate and agree together, with each other, and with diverse other persons, to knowingly purchase firearms, in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of a person, knowing or having reasonable cause to believe that such person had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 932(b)(1).

COUNT 8
(Firearms Trafficking Conspiracy, 18 U.S.C. § 933(a)(1) and (3))

The Grand Jury further charges:

From on or about April 4, 2024 to on or about April 20, 2024, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants GEORGE BAYNES, aka ISSA YUSEF, AARON BETTS, aka HARUN, and others known and unknown to the Grand Jury did knowingly and intentionally combine, conspire, confederate and agree together, with each other, and with diverse other persons, to ship, transport, transfer, cause to be transported or otherwise dispose of firearms to other persons, in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearms by the other persons would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1) and (3).

COUNT 9
(Trafficking in Firearms, 18 U.S.C. § 933(a)(1))

The Grand Jury further charges:

From on or about April 19, 2024 to on or about April 20, 2024, in the Northern District of Ohio, Eastern Division, Defendant AARON BETTS, aka HARUN, did ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit:

DATE	FIREARMS
4/19/2024	(1) American Tactical Firearms, MilSport, 5.56 mm rifle, serial number MSA126976; and (2) Taurus, TH 10, 10 mm pistol, serial number AEM932392
4/20/2024	(1) American Tactical Imports, Omni Hybrid, multi-caliber rifle, serial number NS399119; (2) Anderson Manufacturing, AM-15, multi-caliber rifle, serial number 24030793; and (3) ET Arms, Omega-15, multi-caliber rifle, serial number EV04858

to a recipient in or otherwise affecting commerce, knowing, or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1).

COUNT 10

(Providing Firearms to a Convicted Felon, 18 U.S.C. §§ 922(d)(1) and 924(a)(8))

The Grand Jury further charges:

On or about April 19, 2024, in the Northern District of Ohio, Eastern Division, Defendant AARON BETTS, aka HARUN, did sell or otherwise dispose of firearms, to wit: a American Tactical Firearms, MilSport, 5.56 mm rifle, serial number MSA126976; and a Taurus, TH 10, 10 mm pistol, serial number AEM932392, serial number BPUK003, to a person knowing or having reasonable cause to believe that such person has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(8).

COUNT 11

(Straw Purchasing of Firearms, 18 U.S.C. §§ 932(b)(1))

The Grand Jury further charges:

On or about April 20, 2024, in the Northern District of Ohio, Eastern Division and elsewhere, Defendant AARON BETTS, aka HARUN, did knowingly purchase firearms, to wit: an American Tactical Imports, Omni Hybrid, multi-caliber rifle, serial number NS399119; an Anderson Manufacturing, AM-15, multi-caliber rifle, serial number 24030793; and an ET Arms, Omega-15, multi-caliber rifle, serial number EV04858, in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of a person, knowing or having reasonable cause to believe that such person had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 932(b)(1).

COUNT 12

(Providing Firearms to a Convicted Felon, 18 U.S.C. §§ 922(d)(1) and 924(a)(8))

The Grand Jury further charges:

On or about April 20, 2024, in the Northern District of Ohio, Eastern Division, Defendant AARON BETTS, aka HARUN, did sell or otherwise dispose of firearms, to wit: an American Tactical Imports, Omni Hybrid, multi-caliber rifle, serial number NS399119; an Anderson Manufacturing, AM-15, multi-caliber rifle, serial number 24030793; and an ET Arms, Omega-15, multi-caliber rifle, serial number EV04858, to a person knowing or having reasonable cause to believe that such person has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1).

COUNT 13

(False Statement During Purchase of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

On or about the April 20, 2024, in the Northern District of Ohio, Eastern Division, Defendant AARRON BETTS, aka HARUN, in connection with the acquisition of a firearm, to wit: an American Tactical Imports, Omni Hybrid, multi-caliber rifle, serial number NS399119, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to the licensed dealer, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant falsely represented on ATF Form 4473 that the defendant was the actual transferee/buyer of the firearm, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 14

(False Statement During Purchase of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

On or about the April 20, 2024, in the Northern District of Ohio, Eastern Division, Defendant AARRON BETTS, aka HARUN, in connection with the acquisition of a firearm, to wit: an Anderson Manufacturing, AM-15, multi-caliber rifle, serial number 24030793, and an ET Arms, Omega-15, multi-caliber rifle, serial number EV04858 from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to the licensed dealer, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant falsely represented on ATF Form 4473 that the defendant was the actual transferee/buyer of the firearm, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 15

(Felon in Possession of a Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

On or about May 10, 2024, in the Northern District of Ohio, Eastern Division, Defendant GEORGE BAYNES, aka ISSA YUSEF, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Carrying Concealed Weapon and Possession of Dangerous Ordnance, on or about December 2, 1981, in Case Number CR-81-166166-D, in Cuyahoga County Court of Common Pleas; Carrying Concealed Weapon, on or about November 15, 1990, in Case Number CR-90-252533-ZA, in Cuyahoga County Court of Common Pleas; and Grand Theft and Gross Sexual Imposition, on or about January 23, 1995, in Case Number CR-94-313845-ZA, in Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Smith and

Wesson, Model Lady Smith, .38 caliber revolver, serial number CDU0105, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 16

(Felon in Possession of a Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

On or about May 10, 2024, in the Northern District of Ohio, Eastern Division, Defendant GEORGE BAYNES, aka ISSA YUSEF, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Carrying Concealed Weapon and Possession of Dangerous Ordnance, on or about December 2, 1981, in Case Number CR-81-166166-D, in Cuyahoga County Court of Common Pleas; Carrying Concealed Weapon, on or about November 15, 1990, in Case Number CR-90-252533-ZA, in Cuyahoga County Court of Common Pleas; and Grand Theft and Gross Sexual Imposition, on or about January 23, 1995, in Case Number CR-94-313845-ZA, in Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Springfield Armory, Model XD-9, 9 mm pistol, serial number XD980950, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 17

(Possession of a Firearm in a School Zone, 18 U.S.C. §§ 922(q)(2)(A) and 924(a)(4))

The Grand Jury further charges:

On or about May 10, 2024, in the Northern District of Ohio, Eastern Division, Defendant AARON BETTS, aka HARUN, did knowingly possess a firearm, that is, a Smith and Wesson, Model M&P, 10 mm pistol, serial number DLK2383, that had moved in and affected interstate commerce, on the grounds of High School 1, a secondary school located in Cleveland, Ohio, and

known to the Grand Jury, a place that the defendant knew and had reasonable cause to believe was a school zone, in violation of Title 18, United States Code, Sections 922(1)(2)(A) and 924(a)(4).

COUNT 18
(False Statement to Law Enforcement, 18 U.S.C. § 1001(a)(2))

The Grand Jury further charges:

On or about May 10, 2024, in the Northern District of Ohio, Eastern Division, Defendant AARON BETTS, aka HARUN, knowingly and willfully made material false, fictitious, and fraudulent statements to a Special Agent of the Federal Bureau of Investigation in a matter within the jurisdiction of the executive branch of the government of the United States, that is, when asked by a Special Agent of the Federal Bureau of Investigation for whom the guns Defendant had purchased were for, Defendant stated that the guns were for himself, when in truth and fact, as Defendant then well knew, that statement was false, in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 19
(Murder-for-Hire, 18 U.S.C. § 1958(a))

The Grand Jury further charges:

From on or about April 1, 2024, to on or about May 3, 2024, in the Northern District of Ohio, Eastern Division and elsewhere, Defendant GEORGE BAYNES, aka ISSA YUSEF, knowingly caused another to travel in interstate commerce from the State of Pennsylvania to the State of Ohio with the intent that the murder of Victim 1, a person known to the Grand Jury, be committed in violation of the law of the State of Ohio, namely Ohio Revised Code Section 2903.01, as consideration for a promise and agreement to pay something of pecuniary value, in violation of Title 18, United States Code, Section 1958(a).

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 through 5, 7 through 17, and 19 are incorporated herein by reference. As a result of the foregoing offenses, Defendants GEORGE BAYNES, aka ISSA YUSEF, and AARON BETTS, aka HARUN, shall forfeit to the United States all firearms and ammunition involved in, or used in the commission of the violations charged herein; including, but not limited to, the following:

- A. Smith and Wesson, Model Lady Smith, .38 caliber revolver, serial number CDU0105;
- B. a Springfield Armory, Model XD-9, 9 mm pistol, serial number XD980950; and
- C. a Smith and Wesson, Model M&P, 10 mm pistol, serial number DLK2383.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.